

# ZMO LAW PLLC

**MEMO ENDORSED**

January 11, 2021

*Via ECF*

Hon. Valeria E. Caproni  
United States District Judge  
Thurgood Marshall  
United States Courthouse  
40 Foley Square  
New York, NY 10007

USDC SDNY  
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RE: *U.S. v. Stanley Hampton*, 20 Cr. 667

Dear Judge Caproni:

This office represents the defendant, Stanley Hampton, in the above-captioned case pursuant to an appointment under the Criminal Justice Act ("CJA"). I am writing to request an order authorizing the appointment of my associate, Victoria Medley Esq., to assist me in this case under the CJA. I believe that using Ms. Medley's services will result in more effective and efficient representation for Mr. Hampton in this matter.

Our office expects to receive substantial discovery that Ms. Medley will be assigned to process and analyze. The government indicated at the Status Conference on January 11, 2021 that the quantity of discovery would be large, including video recordings of multiple controlled purchases, undercover reports of purchases, ID procedures, lab reports, police reports, complaint reports, photographs of the crime scene, vouchers recovered from the crime scene, surveillance videos, and information from witnesses.

I expect Ms. Medley to participate in most aspects of the case going forward, including but not limited to reviewing and analyzing discovery, coordinating with Mr. Hampton's family and friends, and conducting legal and factual research.

Ms. Medley has already been providing me with additional support managing this case. For example, Ms. Medley has been communicating with Mr. Hampton, his family, and with the AUSAs assigned to this case. Ms. Medley also wrote a letter motion for Mr. Hampton to the Court requesting a waiver of appearance.

To date, Ms. Medley has worked approximately 5 hours on this case. Therefore, I respectfully request that Ms. Medley be appointed *nunc pro tunc* to December 30, 2020, the day she first began assisting with the case, and that she be permitted to continue assisting me in this matter.

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As set forth in the Section II (A) (1) (a) in the Second Circuit Judicial Committee on Criminal Justice Act Representation Policy and Procedure Manual, (the "CJA Manual") judicial authorization is required for an associate to bill more than ten hours on a CJA matter. The Manual also states at subsection (2) (f):

With respect to non-capital cases, the spirit of The Guide to Judiciary Policies § 620.10.10 (c) also applies to using associates to lower the cost of the representation or to meet time limits. With prior approval for services in excess of ten hours, associates may be used, at the presumptive rate where such services will diminish the total cost of representation.

Additionally, Appendix E to the CJA Manual states that the presumptive hourly rate for a full-time associate at the assigned counsel's firm is \$110 per hour:

In situations where the associate is a full-time employee of the CJA panel member's firm, application can be made to the presiding judicial officer for a rate of \$110 per hour. The additional funds are intended to help defray the costs associated with maintaining said associate such as room rent and telephone.

I have little doubt that the work done by Ms. Medley should diminish the overall cost and will increase the effectiveness of representation. I propose that she be authorized at this time to work on this matter at a rate of one hundred and ten dollars (\$110) per hour.

Ms. Medley is a full-time associate of my firm, which she joined in 2018. She graduated from Brooklyn Law School in 2014 and is admitted to practice law in New York State, as well as the U.S. District Courts for the Southern and Eastern Districts of New York. Ms. Medley has worked on complex federal criminal cases in those districts and civil matters in the Third Circuit. Ms. Medley's experience includes processing and understanding complex discovery. For example, Ms. Medley was appointed as an associate attorney under the CJA to help review voluminous physical and digital discovery and to second-chair at trial in a sex trafficking prosecution that involved four alleged victims, *U.S. v. Lloyd Kidd*, 18. Cr. 872 (VM).

Please do not hesitate to contact me if you have any questions. Thank you for attention to this request.

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Very truly yours,

*Zachary Margulis-Ohnuma*

Zachary Margulis-Ohnuma

Application GRANTED.

SO ORDERED.

*Valerie Caproni*

HON. VALERIE CAPRONI  
UNITED STATES DISTRICT JUDGE

1/12/2021